

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY
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LEONARD PATTI

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

DR. GEORGE C. PECK JR

COMPLAINT

Jury Trial: ☒ Yes ☐ No

(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	<u>LEONARD PATTI</u>
	Street Address	<u>80 HERMAN ST.</u>
	County, City	<u>BERGEN CO., E. RUTHERFORD</u>
	State & Zip Code	<u>NEW JERSEY 07073</u>
	Telephone Number	<u>551 574 0541</u>

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name GEORGE C. PECK JR.
Street Address 776 NORTHFIELD AVE
County, City ESSEX CO., W. ORANGE
State & Zip Code N.J. 07052

Defendant No. 2

Name _____
Street Address _____
County, City _____
State & Zip Code _____

Defendant No. 3

Name _____
Street Address _____
County, City _____
State & Zip Code _____

Defendant No. 4

Name _____
Street Address _____
County, City _____
State & Zip Code _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

- A. What is the basis for federal court jurisdiction? (check all that apply)



Federal Questions



Diversity of Citizenship



U.S. Government Plaintiff



U.S. Government Defendant

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue?

AMENDMENT TO THE U.S. CONSTITUTION, ARTICLE VII
1- MY RIGHT TO A TRIAL BY JURY
2- ACCORDING TO THE RULES OF COMMON LAW

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? DR. GEORGE C. PECK'S OFFICE
776 NORTHFIELD AVE, ESSEX CO, W. ORANGE, N.J.
07052

B. What date and approximate time did the events giving rise to your claim(s) occur? 12-16-2014
APPROX. 10:00 AM — PREVIOUS 6-6-2013 —
PREVIOUS JUNE 9, 2011 — PREVIOUS 3-11-2010

What
happened
to you?

C. Facts: I SUFFERED FOUR OPERATIONS. I HAVE
OUR OPERATIVE REPORTS THAT CLEARLY PROVE DR PECK
HAD NO INTENTION OF REMOVING THE IMPLANT AS
HE COMMITTED TO DO - IN THE CONSULTATION VISIT.

Who did
what?

DR. PECK TRIMMED THE IMPLANT, LEAVING IT SOLELY
ON THE SORE SPOT, AGGRAVATING THE WOUND TEN
TIMES AS MUCH.

Was
anyone
else
involved?

Who else
saw what
happened?

IV. Injuries

If you sustained any injuries related to the events alleged above, describe them, and state what medical treatment, if any, you required and received.

The injuries were four operations: I am entitled to the dignity, to not be put through such an ordeal.

It is now six years since this implant was supposed to be taken out.

What gives Dr. Peck the right to operate on my body; and make decisions contrary to what we agreed upon? As the operative reports so state. Dr. Peck's license to practice medicine should be revoked. Asside from the 4 operations, he trimmed the part of the implant resting on the dorsum, leaving it sit right on the sore spot; increasing the discomfort (40 years) ten times. Why was the implant resting on the dorsum in the first place ?

I told Dr. Peck I do not take drugs or medication. I believe he was jealous: I believe that was one of the reasons he started takeing advantage of me, as others, so stated. If this operation wasn't absolutely necessary, I would never have agreed to an operation or anesthesia:

I still require an operation. I can't put up with this phony implant any longer.

Dr. Peck was not obligated to do the operation in the first place. He did the three subsequent operations to cover his tracks. He had to cover his tracks because he had no other excuse: his act was intentional.

V. Relief:

State what you want the court to do for you, and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

What price can you put on four operations? It is obvious Dr. Peck had no intention of removing the implant. Therefore the basis for the suit is the fact that his action was intentional. It was an assault . I went through my whole life never intending to sue anyone. But this was totally unconscionable, dispicable, and nasty. I never expected this sort of thing, especially, from a doctor. The reason he did it was because the Affidavit of Merit gave him a license to do so.

I believe I should be entitled to punitive damages? I attempted to file criminal charges at the W. Orange police dept. but the police called Dr. Peck; and he told them that it was a malpractice case, so the police would not let me file charges.

I am seeking \$40,000 plus the \$7,400 I gave him originally, for the operations. I would not go through one operation for that price.

If I were able to get a lawyer and an operation @ \$20,000, the only quote I have thus far; my cost would be 62% of what I am suing for, not including my time and trouble: one year filing motions & briefs, and pain and suffering.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 16 day of JANUARY, 20 17.

Signature of Plaintiff Leonard Patti
Mailing Address 80 HERMAN ST.
E. RUTHERFORD, N.J.
07073
Telephone Number 201 921 7713
Fax Number (if you have one) _____
E-mail Address _____

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff: Leonard Patti